

REMARKS

Claims 1-11 and 13-28 are pending in this application.

Claims 1-11 and 13-28 stand rejected under 35 USC § 103(a) as obvious over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et al. (U.S. Patent No. 5,612,889). The rejection is respectfully traversed.

The arguments filed on August 31, 1999 in response to the Official Action issued June 18, 1999, are reasserted herein.

It is perhaps worthwhile noting that, according to Pintsov and as described in column 11, line 52, through column 13, line 30, a mailer forwards a mailing file 120 (shown in Figure 2) to a carrier service (e.g. a mail delivery service). The carrier service generates a mailing identification file 122 that includes a unique mail ID 306 (which, as shown in Figure 3, does not include a zip code) for each mail piece in the mailing file 120 and forwards file 122 to the mailer for an address character number check. The unique mail ID 306 is then printed on a piece of mail 104a, shown in Figure 6, sent to the carrier service by the mailer. The carrier service accesses the mail identification file 122 (Figure 3) and the mail processing file 124 (Figure 4) using the unique mail ID 306 printed on the mail piece. The mail identification file 122 is accessed using this unique mail ID 306 to ensure that the unique mail ID 306 printed on the mail piece matches with a unique ID 306 in the file 122 and to retrieve any address correction information. Hence, file 122 is accessed using the unique ID 306 (not a "zip code") and information in file 122 is retrieved based on its correspondence with the unique ID 306 (not a zip code).

The mail processing file 124 is accessed using this unique mail ID 306 to retrieve the correct delivery point postal code 402 (the recipient's original or modified address) which corresponds to the unique ID 306 printed on the mail piece 104a. The retrieved delivery point postal code 402 is printed on the mail piece 104a as code 1002 shown in Figure 10. Hence, file 124 is also accessed using the unique ID 306 (not a zip code) and information in file 124 is also retrieved based on its correspondence with the unique ID 306 (not a zip code). The mail piece 104a of Figure 10 can then be delivered to the recipient.

The unique mail ID 306 may also be used by the carrier service to charge the mailer's debit account. Hence, to the extent that Pintsov can be viewed as in any way relating to payors and payees (or merchants), the mailer would necessarily be the payor and the carrier service would necessarily be the payee/merchant.

Thus, Pintsov et. al. discloses a mail system for securely protecting payment to the carrier service by ensuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. As described in column 12, line 51, through column 13, line 30, and shown in Figures 6 and 10, each mail piece is marked with a unique mail piece ID 306 (which as noted above is explicitly disclosed not to be a zip code). The printed unique ID 306 is used in the authorization process. In this regard, the unique mail piece ID 306 printed on the mail piece 104a is used to access the correct information in the mailing files 122 and 124 (shown in Figures 3 and 4) to ultimately retrieve the extended zip code 402 (shown in Figure 4). The extended zip code 402 is then printed on the mail piece 104a as indicated by reference numeral 1002, and

used to identify the delivery point to which delivery is made (column 11, lines 39-51).

The stored extended zip code 402 may be altered due to an address change (column 7, lines 49-56, column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4). Information is processed to debit the mailer's account, and a mailing ID file is sent to the mailer after the debiting of the mailer's account (column 10, lines 54-55).

In the final Official Action, the Examiner reiterates the arguments made in the Official Action issued June 18, 1999 in rejecting claims 1-4, 6-18 and 20-28. As indicated above, the remarks filed on August 31, 1999 addressing these Examiner arguments are reasserted herein. As discussed therein, it is respectfully submitted that the applied combination of art lacks any teaching or suggestion of using a zip code to locate or retrieve a file or record which has an associated corresponding zip code. It is further respectfully submitted that the applied combination of art lacks any teaching or suggestion of processing information excluding a received zip code to identify a zip code which is then used to locate or retrieve a file or record having an associated corresponding zip code. Further still, the applied combination of art lacks any teaching or suggestion of using a zip code to locate or retrieve a file or record which has an associated corresponding zip code and to use this file or record to direct a payment to a payee or merchant.

Rather, the proposed combination at best discloses using a unique ID, which does not include a zip code, to access a stored record having a corresponding unique ID to obtain a zip code for the recipient. Pintsov also discloses that the unique ID can be used to access a stored

change of address record having a corresponding unique ID to obtain a changed zip code for the recipient and substituting the changed zip code for the original zip code in the stored file.

Therefore, it is respectfully submitted that the applied combination of art lacks any teaching or suggestion, and in fact teaches against:

1)processing the received payment information other than received payee zip code to identify an eleven digit zip code for a payee, and accessing the database of payee records to locate the payee record having the payee zip code corresponding to the identified eleven-digit zip code, as required by independent claim 1.

2)processing the received name, city and state information to identify an eleven digit zip code for a payee, and accessing the database of merchant records to locate the merchant record for the merchant corresponding to the identified eleven-digit zip code, as required by independent claim 10.

3)a processor configured to process the payment information, excluding the received payee zip code, to produce an eleven-digit zip code for the payee and to retrieve one or more of the plurality of payee records having an associated zip code corresponding to the eleven-digit zip code from the storage device code, as required by independent claim 11.

4)software which causes a processor to process the payment information, excluding the received payee zip code,

to identify an eleven digit zip code for the payee, and to access a database of payee records to locate a payee record corresponding to the eleven-digit zip code within a database, as required by independent claim 16.

5)a second station, coupled to the network, configured to receive the payment information from the first station via the network, process the payment information to produce an eleven digit zip code for the payee, and access the database to locate a payee record for the payee corresponding to the eleven digit zip code, as required by independent claim 22.

6)determining if the stored payee name information and the stored payee address information included in any of the plurality of payee records correspond to the received payee name information and the received payee address information, directing payment in accordance with a first of the plurality of payee records if the stored payee name information and the stored payee address information included in the first payee record is determined to correspond to the received payee name information and the received payee address information, processing the received payee address information to identify an eleven digit zip code if none of the plurality of payee records include stored payee name information and stored payee address information which is determined to correspond to the received payee name information and the received payee address information, determining if the stored payee zip code included in any of the plurality of payee records corresponds to the identified eleven-digit zip code, and directing payment in accordance with a second of the

plurality of payee records if the stored payee zip code included in the second payee record is determined to correspond to the identified eleven-digit zip code, as required by independent claim 28.

With regard to claims 5, 19 and 27, the Examiner, as understood, takes Official Notice that it is well known to locate a payee record by matching, and on this basis concludes that the combination of Kight, Pintsov and this Official Notice made it obvious to locate a payee record by matching (i) an identified eleven digit zip code with a zip code in the database of payee records and (ii) a portion of a received payee name with a portion of a payee name in the database of payee records. The Examiner further argues that one would have been motivated to perform such matching because this information is part of the payee's account which is unique to the applicable payee.

It is first requested, to the extent the rejection is to be maintained, that the Examiner produce and apply prior art, combinable with the applied base combination of art, which will support the Official Notice. Further, as discussed above, Pintsov, in column 12, line 51, through column 13, line 30, teaches that a unique ID 306, which is explicitly disclosed as not including a name, address or zip code should be used to access the files from which the correct extended zip code 402 is retrieved. Thus, Pintsov explicitly teaches locating a record by matching a unique ID (which does not include a name, address or zip code zip code) with an identical ID 306 in the record 122 or 124 to identify a zip code 402. Therefore Pintsov clearly teaches against matching a zip code with the zip code 402 in the records 122 and 124 and matching a portion of a name with a portion of the name 304 in the records 122 and 124.

Accordingly, Pintsov's teachings are inconsistent with the Official Notice. Further, even if Pintsov disclosed matching a portion of the name 304 or zip code in 304 or 402 (which is clearly not the case), the zip code and name being matched would be that of the recipient and not the payee (who as noted above is the carrier service).

Therefore, the combination of Kight, Pintsov and Official Notice at best suggests that Kight's system be modified to match a unique ID (which does not include the merchant's name, address or zip code zip code) received with the payment request from the payor with a unique ID generated and stored in Kight's database by the payment service provider, to access the database record having the matching unique ID to retrieve the payee's zip code and/or the payee name from the accessed record, and to direct payment the in accordance with the retrieved name and/or zip code information.

Accordingly, the proposed combination fails to teach or suggest locating a payee record (i) by matching an identified eleven digit zip code with the zip code in the database payee record or (ii) a portion of the received payee name with a portion of the payee name in the database payee record, as required by claim 5; or by comparing a portion of the payee name with a payee name in the payee record, as required by claims 19 and 27.

With regard to claim 28, the Examiner, as understood, points to Kight column 2, lines 5-11 and 40-45, and Pintsov column 11, line 52, through column 12, line 12, as disclosing all recited features, including the alternative directing of payments based on either the correspondence of (i) payee name and address information or (ii) payee zip code information. The Examiner further argues that one

would have been motivated to perform such alternative directing of payments because, in order for payment remittance processing to occur without error, there needs to be some type of validation process which will make sure that the correct person is getting paid at the correct address.

Claim 28 requires that it be determined if stored payee name and payee address information included in any of the plurality of payee records corresponds to received payee name and payee address information. Also required is that (i) if the stored payee name and payee address information included in the first payee record is determined to correspond to the received payee name and payee address information, payment is directed in accordance with a first of the plurality of payee records, and (ii) if none of the plurality of payee records include stored payee name and payee address information which is determined to correspond to the received payee name and payee address information, the received payee address information is processed to identify an eleven digit zip code, a determination is made if a stored payee zip code included in any of the plurality of payee records corresponds to the identified zip code, and payment is directed in accordance with a second of the plurality of payee records if the stored payee zip code included in the second payee record is determined to correspond to the identified zip code.

The Pintsov disclosure referenced by the Examiner relates to the matching of (i) data in the mailer's mailing file 120 (Figure 2) with (ii) data in the mailing identification file 122 (Figure 3) created by the carrier service, to confirm that the data in the mailing

identification file 122 is correct before the unique ID 306 is printed on the mail piece. It is first respectfully submitted that according to Pintsov, the matching is performed on the mailing identification file 122 which is transmitted by the carrier service and received by the mailer, and hence the mailer performs the matching. Accordingly, at best a combination of Kight and Pintsov would suggest that data from Kight's database be retrieved and forwarded back to the payor for confirmation that the accessed data is correct before this data is used by the payment service provider to direct payments to the payee. Further, Pintsov discloses only one match to confirm the correctness of the data, i.e. a match of the number of characters in each address in the mailing file 120 with the address character number 314 in the mailing identification file 122. Further still, Pintsov determines if the names and addresses of all the recipients (not one particular recipient) included in the mailing identification file 122 correspond to the names and addresses of all the recipients included in the mailing file 120.

Moreover, Pintsov, and hence the proposed combination of art, lacks any suggest that (i) if the stored name and address information included in a first of a plurality of records is determined to correspond to received name and address information, payment be directed in accordance with the first record, and (ii) if none of the plurality of records include stored name and address information which is determined to correspond to the received name and address information, the received address information be processed to identify a zip code, a determination be made if a stored zip code included in any of the plurality of records corresponds to the identified zip code, and payment

be directed in accordance with a second of the plurality of records if the stored zip code included in the second record is determined to correspond to the identified zip code. In fact, Pintsov is incapable of accommodating such alternatives, since Pintsov requires that the number of characters in the name, address and zip code 204 match with the number of characters 314 or processing stops.

Thus, Kight modified by Pintsov, would at best suggest (i) if the number of characters in the name and address stored by the service provider in Kight's database records is determined by the payor to correspond to a designated number of characters in the payment request received from the payor, the payor would confirm this to Kight's service provider before proceeding with the processing of the payment request, and (ii) if the number of characters in the name and address stored by the service provider in Kight's database records is determined not to correspond to a designated number of characters in the payment request received from the payor, processing of the payment request would stop. Hence, unlike in claim 28, there are no alternative matches disclosed in the applied art combination, or any disclosure of processing received address information to identify a zip code, determining if a stored zip code included in any of the plurality of records corresponds to the identified zip code, and directing payment in accordance with a second of the plurality of records if the stored zip code included in the second record is determined to correspond to the identified zip code.

With regard to claims 1-4, 6-11, 13-18 and 20-26, the Examiner, as understood, contends that Pintsov in column 12, lines 23-32, discloses that postage information, which

the Examiner considers equivalent to the recited payment information. The postage is debited to the mailer's account, which the Examiner considers equivalent to the recited payee record. The Examiner further asserts that the mailer's account forms part of a file including a list of addresses having zip codes associated with each address, which the Examiner considers equivalent to the database of payee records (as, for example, recited in independent claims 1, 16 and 22) or the stored payee records (as, for example, recited in independent claim 11).

The referenced text relates to payment by the mailer to the carrier service. Contrary to the Examiner's contention, the account described in the referenced text is a debit account of the mailer, who is the payor, and accordingly is by no means equivalent to the recited payee record. As discussed above, in the case of Pintsov, the payee is the carrier service. Additionally, the mailer's debit account is taught by Pintsov to be associated with the unique identifier. Although it is true that the unique identifier is also associated with the mail records, there is nothing within Pintsov to suggest that the debit account is part of the mail record. Rather, in discussing the mailer's debit account on column 12, lines 25-30, Pintsov fails to in any way suggest that this account is identified in the mail record. Nor is there any suggestion in Pintsov's discussion of the files shown in Figures 2-4, that the account numbers 202 and 302 are other than the mailer's account number with the carrier service. Nor is there any suggestion in Pintsov that any other number referenced in the depicted files is the mailer's debit account number.

The Examiner goes on to state that, as acknowledged by Applicants' representative, Pintsov in column 10, lines 54-55, discloses that the mail piece ID 306 is associated with each address and each address has a zip code. This disclosure is relied on by the Examiner as suggesting (i) the recited processing of payment information (which in the case of independent claims 1, 11 and 16 excludes the payee zip code), to identify or produce a zip code, and (ii) the recited accessing of a database of payee records (which in the case of claims 1, 11 and 16 each include a zip code), to locate the desired payee record corresponding to the identified zip code, or the recited retrieval from such a database of the payee record(s) which correspond to the produced zip code. The Examiner in the prior Official Action also relied on Pintsov, column 7, lines 49-52, in support of the rejection.

It is respectfully submitted that, to the extent Pintsov discloses processing payment information in the referenced text, it has nothing whatsoever to do with identifying a zip code. Rather, what the Examiner construes as payment information is processed only to debit the mailer's account. At best this corresponds to generating a payment request. The discussion of the mailing ID file 122 in the referenced text in column 10 is unrelated to the processing of what the Examiner construes as payment information, except to the extent that the file 122 is only sent to the mailer after the debiting of the mailer's account. Furthermore, there is no identifying of a zip code based on the relied upon processing.

In the referenced text, Pintsov also discloses altering the stored zip code due to an address change. However, here again the received information is not used to

identify a zip code, which is in turn used to access or retrieve file information. Rather, Pintsov uses a unique ID other than the zip code (see for example Figure 6 and column 12, line 51, through column 13, line 15) to access a stored file to obtain an extended zip code and prints the extended zip code on a piece of mail. The unique ID is also, when appropriate, used to access a stored change of address to obtain a changed zip code, which is substituted for the original zip code in the stored file.

The relevance of the Official Notice taken by the Examiner is not understood. The Examiner asserts that it is old and well known to access a database to locate payee information. However, even if this were true, which is not conceded, the claims recite using a zip code for accessing data to locate or retrieve payee information corresponding to the zip code. Further, the claims require processing other received information to identify the zip code which is used to locate or retrieve the payee information which has an associated corresponding zip code.

As clearly indicated in Figure 4 of Pintsov, and the related descriptive text, Pintsov uses a unique identifier 306 (which, as shown in Figure 3, do not include zip codes) to access zip code and other data associated with a corresponding unique identifier. The present invention recited in each of independent claims 1, 10, 11, 16, 22 and 28, requires that data is located or retrieved based on its association with a zip code which corresponds to a zip code identified from received information. Hence, unlike Pintsov, and thus the combined art, according to the present invention an identified zip code (and not a unique identifier excluding a zip code) is used to access other data associated with a corresponding zip code. Therefore,

according to the present invention, there is no need for special identifiers to be generated or stored to ensure that the correct payee data is accessed in response to a payment request.

With respect to claims 10 and 22, in the prior Official Action, the Examiner pointed to Pintsov (column 11, lines 26-29 and 49-51 and column 13, lines 55-59) as making obvious the recited processing to identify an eleven digit zip code in order to deliver payment to the correct entity regardless of changes in the entity's address.

The Examiner, as understood, now relies on Pintsov's use, as acknowledged by Applicants' representative, of a unique identifier (i.e. mail piece ID 306) which is associated with each address, and the fact that each address has a zip code, as suggesting the recited accessing of a database of payee or merchant records, to locate the payee or merchant records corresponding to an identified zip code.

The Examiner also relies on Kight's disclosure in column 3, lines 32-34, that the payment information includes a name and address and Pintsov's disclosure that the unique identifier (i.e. mail piece ID 306) serves as the mailer's identification, which in the postal industry is the mailer's name and address, as suggesting the processing of a merchant's name, city and state information to identify a zip code which is used to access a database of merchant records to locate a merchant record corresponding to the identified zip code as recited in claim 10.

As discussed in the prior response, contrary to the Examiner's position, as can best be understood, Pintsov, and hence the proposed combination of art, lacks any

teaching or suggestion of using an identified zip code to access a database as recited. Rather, as discussed also above, Pintsov uses a unique identifier to access files.

The applied combination of references at best teach or suggest accessing a stored payee record to obtain a zip code or changed zip code using a unique ID other than the zip code. The applied art also lacks any teaching or suggestion of using the name, city and state to identify the zip code.

With regard to claims 8, 14 and 20, in the prior Official Action, the Examiner relied on Kight (column 3, lines 4-9) as disclosing verifying an account number and transforming the verified account number. As noted in the prior response, Kight's disclosure in referenced text relates to verifying a bank account number and not to verifying a merchant account number as recited in the present claims.

The Examiner now acknowledges that Kight discloses only the verification of a bank account number (and not a merchant account number) in the previously referenced text, but contends that this is equivalent to the recited validation of the payee account number according to validation rules corresponding to payee values for fields of the account number. The Examiner also points out that Kight in column 7, lines 10-12, does disclose validation of a merchant's account.

Although it is acknowledged that Kight, in columns 3, lines 4-9 and 7, lines 10-12, does generally disclose the need for validation of the bank and payee account numbers, Kight does not disclose any particulars as to how these validations are performed. Further, there is nothing in Kight to suggest that the bank account number and the payee

account number should or could be validated in the same way. Hence, Kight lacks any suggestion that the payee account number is validated in accordance with validation rules corresponding to payee values for fields of the account number.

In the prior Official Action, the Examiner also acknowledged that Kight fails to teach validation rules but pointed to Pintsov (column 10, lines 61-65, column 11, lines 56-67, and column 12, lines 1-4) as teaching a unique identifier with an error correction code and a validation process. However, as noted in the prior response, Pintsov fails to disclose what the referenced error correction code is used for.

The Examiner now acknowledges that Pintsov's fails to disclose what the disclosed error correction is used for, but goes on to assert that Pintsov's disclosure of an undefined encryption validation process in column 11, line 56, through column 12, line 4, validates the mailer identification file, including an account number, and contends that this is equivalent to the recited validation of the payee account number according to validation rules corresponding to payee values for fields of the account number.

Although it is acknowledged that Pintsov does disclose a simple encryption validation process, it is respectfully submitted that Pintsov lacks any teaching or suggestion whatsoever of validating an account number based on validation rules corresponding to values for fields of the account number. In fact, Pintsov's account number 302 is never validated. Rather, as described in the referenced text only the addresses 304 in the mailing identification file 122 are validated by matching the number of characters

in each address 304 to the applicable numeric in the unique ID 306.

With regard to claims 9, 15, 21 and 24, in the prior Official Action the Examiner acknowledged that Kight fails to teach identifying one of a plurality of remittance centers. The Examiner went on to point to Pintsov (column 11, lines 39-51) as disclosing the use of a zip code to identify a single delivery point to which delivery is directed. However, as noted in the prior response, Pintsov lacks any disclosure of using an account number to identify one of a plurality of different delivery points associated with a single entity as recited.

The Examiner now contends that Pintsov discloses mailing files that include a mailer account number and which are accessed to retrieve a destination delivery code. The Examiner further asserts that even though the mailer's account (not the merchant's account) is used by Pintsov, all steps for the identification are disclosed.

The Examiner's rationale is not understood. The applicable claims require that a single payee have a plurality of remittance centers and that an account number be processed to identify a single one of the plurality of remittance centers to which payment for that payee is to be directed. Pintsov lacks any disclosure whatsoever of processing an account number, let alone processing an account number to determine a destination address of the recipient. Rather, as best can be determined from Pintsov's disclosure, the only account number disclosed (i.e. account number 302) simply identifies the mailer. Furthermore, if Pintsov's unique ID were to be considered to correspond to an account number (which is clearly not the case), the unique ID identifies the address of the

recipient (who is not a payee in Pintsov), and not the carrier carrier service which is the only payee in Pintsov. Further still, the unique ID is selected to identify only a single address. Hence, there is absolutely no need to process a unique ID to identify which one of multiple addresses mail mail should be directed to.

With respect to claim 23, in the prior Official Action the Examiner acknowledged that Kight fails to disclose transformation of an account number based upon alteration rules. The Examiner pointed to Pintsov (column 10, lines 61-65 and column 7, lines 49-52) as teaching a unique identification number having a specific format and transforming mail address codes into new delivery point postal codes. On this basis the Examiner concluded that it was obvious to format account numbers in accordance with alteration rules in order to make sure that the payment is from the correct payer. However, as discussed in the prior response, Pintsov lacks any disclosure of altering the unique identification number. What Pintsov does disclose is altering the extended zip code due to an address change. Hence, Pintsov's alterations might be used in modified form, with the present invention to update the merchant database, but clearly fail to make obvious the recited alteration of the account number.

The Examiner, as understood, now contends that Pintsov in column 10, lines 61-65, discloses that each mailing file includes a unique ID (associated with an account code and having a specific format) and addresses listed in the file. The Examiner also contends that Pintsov discloses altering the zip code due to an address change, and that the format of the unique identifier will change depending on the mailer because the mail piece count 312 and the number of

address characters 314 will be different for each mailer on the mailing list.

Claim 23 requires that a payor account number be transformed according to alteration rules indicative of a format of account numbers of the payee. It is first respectfully submitted that the only account number disclosed by Pintsov (i.e. mailer account number 302), is not disclosed by Pintsov to be altered in any way. Further, even if the unique ID 402 were to be considered an account number (which would be improper), although the content of the ID may change as discussed in column 10, lines 61-65, there is nothing within Pintsov to suggest that the format as shown in Figures 3 and 4, could be, let alone would be changed. Clearly, altering the zip code 404 due to a change in the address 304, the mail piece count 312 and/or the number of address characters 314 will have no effect whatsoever on the format of the unique ID 306. Furthermore, there is nothing in Pintsov to suggest that a received unique ID is somehow processed and altered. Rather, implicit in Pintsov is that received unique ID which is used to access the corresponding mail processing file to retrieve the deliver point postal code, should not be modified, since this would lead to an improper deliver point postal code being retrieved.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the

application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,
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